REMARKS

The Office Action mailed July 7, 2009 was received and carefully reviewed.

Prior to this response, claims 1 and 19-37 were pending in the subject application. Presently, no claims have been amended, no claims have been canceled, and no new claims have been added. Claims 2-18 were canceled by a previous reply. Claims 25 and 35 remain withdrawn from consideration for being directed to a non-elected invention. Thus, claims 1 and 19-37 remain pending in the subject application.

Reconsideration and withdrawal of the currently pending rejections are requested for the reasons advanced in detail below.

Claim Rejections - 35 U.S.C. § 103

Claims 1, 19-24, 26-34, 36, and 37 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Arao et al. (U.S. Patent No. 6,639,265 B2) (*Arao*, hereinafter) in view of Japanese Patent No. 2003-318133 (machine translation) (*JP '133*, hereinafter) and in further view of Kobayashi et al. (U.S. Pub. No. 2002/0006558 A1) (*Kobayashi*, hereinafter). Applicants traverse the rejections for at least the reasons set forth below.

Independent claims 1 and 26, and the claims dependent therefrom, are patentably distinguishable over *Arao*, *JP '133*, and *Kobayashi*, since *Arao*, *JP '133*, and *Kobayashi*, taken either alone or in combination, do not disclose, teach, or suggest each and every feature recited in the pending claims. For example, independent claim 1 (emphasis added) recites:

> 1. A liquid crystal display device comprising:
> a substrate;
> a base film comprising a photocatalyst formed over the substrate;
> a thin film transistor formed over the base film;
> a projection comprising a conductive material formed over at least one of a drain electrode and a source electrode of the thin film transistor;
> an interlayer insulating film formed over the thin film transistor; and
> a pixel electrode connected to the projection,
> wherein the interlayer insulating film is interposed between the base film and the pixel electrode,
> wherein the projection has a stacked structure including a plurality of conductors and
> **wherein each of the plurality of conductors is in direct**

contact with the interlayer insulating film.

Independent claim 26 (emphasis added) recites:

> 26. A liquid crystal display device comprising:
> a pixel portion comprising:
> a base film comprising a photocatalyst formed over a substrate;
> a thin film transistor formed over the base film;
> a first projection comprising a conductive material formed over at least one of a drain electrode and a source electrode of the thin film transistor;
> an interlayer insulating film formed over the thin film transistor; and
> a pixel electrode connected to the first projection;
> a terminal portion comprising:
> the base film comprising the photocatalyst formed over the substrate;
> a first wiring formed over the base film;
> a first insulating film formed over the first wiring;
> a second wiring formed over the first insulating film;
> a second projection comprising a conductive material formed over the second wiring;
> a second insulating film formed over the second wiring; and
> a terminal electrode connected to the second projection,
> wherein the interlayer insulating film is interposed between the base film and the pixel electrode,
> wherein each of the first projection and the second projection has a stacked structure, said first projection including a plurality of first conductors and said second projection including a plurality of second conductors; and
> **wherein each of the plurality of first conductors is in direct contact with the interlayer insulating film and each of the plurality of second conductors is in direct contact with the second insulating film.**

As seen above, independent claim 1 is directed to, *inter alia*, the feature wherein each of the plurality of conductors is in direct contact with the interlayer insulating film. As also seen above, independent claim 26 is directed to, *inter alia*, the feature wherein each of the plurality of first conductors is in direct contact with the interlayer insulating film and each of the plurality of second conductors is in direct contact with the second insulating film.

Applicants contend that neither *Arao*, *JP '133*, nor *Kobayashi*, taken either alone or in combination, disclose, teach, or suggest the feature wherein each of the plurality of conductors is in direct contact with the interlayer insulating film, as recited in present independent claim 1. Applicants further contend that *Arao*, *JP '133*, and *Kobayashi*, taken

either alone or in combination, also fail to disclose, teach, or suggest the feature wherein each of the plurality of first conductors is in direct contact with the interlayer insulating film and each of the plurality of second conductors is in direct contact with the second insulating film, as recited in present independent claim 26.

As seen on pages 4 and 8 of the Office Action, the Examiner correctly admits that "Arao…does not disclose wherein each of the plurality of conductors is in direct contact with the interlayer insulating film", and relies on *JP '133* for allegedly disclosing "a light emitting element part (140a, [Drawing 23], page 34 of 47) wherein each of the plurality of conductors (142, 144, [0156] is in direct contact with the interlayer insulating film (148, [0155])", with respect to independent claims 1 and 26.

However, as shown in paragraph [0156] of the machine translation of *JP '133*, item 142 is an electron hole transportation/pouring layer and item 144 is a luminous layer. If *Arao* and *JP '133* were combined, it would appear that in *Arao* a light emitting element rather than a source or drain wiring 144 would be formed between a thin film transistor 204 and a pixel electrode 156.

As seen in Drawings 18C-D of *JP '133* an electric conduction film 112 is interposed between insulating films 114, as delineated in the explanation of letters or numbers section. Consequently, even if it were proper to combine *Arao* and *JP '133*, which Applicants assert that it is not, it would appear that in *Arao* a thin film transistor 204 would not be electrically connected to a pixel electrode 156. Thus, in combining the device of *JP '133* with the device of *Arao* would actually render *Arao*'s device unworkable.

Furthermore, Applicants contend that *Kobayashi* fails to remedy the above-recited deficiencies with respect to *Arao* and *JP '113*. Consequently, the Examiner has failed to provide a proper *prima facie* case of obviousness in the rejection of independent claims 1 and 26. Thus, it is hereby requested that the rejection under 35 U.S.C. § 103(a) be withdrawn, and that independent claims 1 and 26 be allowed.

Claims 19-24, 27-34, 36, and 37 are allowable at least by virtue of their dependency from one of the independent claims, but also because they are distinguishable over the prior art. Thus, is it hereby requested that the rejection under 35 U.S.C. § 103(a) be withdrawn, and that claims 19-24, 27-34, 36, and 37.

In view of the foregoing, it is submitted that the present application is in condition for allowance and a notice to that effect is respectfully requested. However, if any issue remains after considering this response, the Examiner is invited to call the undersigned to expedite the prosecution and work out any such issue by telephone.

Except for issue fees payable under 37 C.F.R. § 1.18, the Commissioner is hereby authorized by this paper to charge any additional fees during the entire pendency of this application including fees due under 37 C.F.R. §§ 1.16 and 1.17 which may be required, including any required extension of time fees, or credit any overpayment to Deposit Account No. 19-2380. This paragraph is intended to be a **CONSTRUCTIVE PETITION FOR EXTENSION OF TIME** in accordance with 37 C.F.R. § 1.136(a)(3).

Respectfully submitted,

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